

REMARKS

Favorable reconsideration and allowance of the present application are respectfully requested.

Claims 1-18 are currently pending in the present application. Of these, claims 1, 11 and 16 are independent claims.

Claims 2-10 and 11-18 were objected to because of certain informalities described in the Office Action. By the above amendment, each of these claims has been amended to correct the recited informalities. Accordingly, withdrawal of the objection to claims 2-10 and 11-18 is respectfully requested.

Claims 7 and 9 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. In this regard, the Office Action notes that the term "predefined configuration objects" in claim 7 lacks proper antecedent basis. Claim 7 has been amended above to correctly recite "topological configuration objects."

Applicant respectfully traverses the rejection of claim 9 as being written in an improper dependent form. In this regard, the Office Action states that claim 9 does not further limit claim 1 because "claim 1 states that the first and second messages are in the same format." It should be noted, however,

that claim 9 is dependent on intervening claim 8 which states that a third message is issued at a second interface "in a second message format." Thus, the second message format recited in claim 9 relates to the "third message" rather than the "second message" discussed in claim 1. Accordingly, it is respectfully submitted that claim 9 is in proper dependent form and should have been considered.

Claims 1, 3-7 and 16-17 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Pat. No. 6,606,660 to Bowman-Amuah. Claims 8 and 10 were rejected under 35 U.S.C. 103(a) as being unpatentable over Bowman-Amuah in view of U.S. Publ. No. 2003/0009543 to Gupta. Claims 2 and 11-15 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Publ. No. 2003/0051236 to Pace. Claim 18 was rejected under 35 U.S.C. 103(a) as being unpatentable over Bowman-Amuah in view of U.S. Pat. No. 6,681,228 to Balogh. The rejection of Applicants' claims is respectfully traversed.

Regarding the rejections under Section 103(a), the secondary references to Gupta, Pace and Balogh are cited by the Examiner allegedly to show elements of Applicant's claims that are admittedly missing from the primary reference to Bowman-

Amuah. It is axiomatic, however, that the references applied in the rejection of Applicants' claims must first be prior art to the present application.

The present application was filed on August 27, 2001 and claims the benefit of provisional application serial no. 60/228,219 filed on August 25, 2000. The Gupta reference was filed on April 30, 2001 -- more than eight months after the filing date of Applicants' provisional application. Similarly, Balogh has an actual filing date of November 1, 2002 based on an earliest provisional filing date of November 1, 2001. This is well after Applicants' effective filing date of August 25, 2000 (and the August 27, 2001 filing date of the present utility application). Likewise, Pace has an actual filing date of September 4, 2001, which is after the August 27, 2001 filing date of the above-referenced utility application. In addition, the Pace publication relies on an earliest provisional filing date of September 1, 2000, which is likewise after Applicants' effective filing date of August 25, 2000.

The Office Action provides no rationale as to the manner in which the secondary references are considered to be prior art, or by which they are properly asserted as a reference against

Applicant's claims. Because these references are not prior art to the present application, it is respectfully submitted that all claims against which they were applied should be indicated as allowable at least on this basis. Accordingly, withdrawal of the rejections under 35 U.S.C. § 103(a) is respectfully requested.

While the Bowman-Amuah reference does recite a filing date earlier than the present application, Applicant believes that he can, if necessary, establish an antedating date of invention. Such is not believed necessary at the present time, however, because Bowman-Amuah is not believed to teach or suggest Applicant's inventive subject matter.

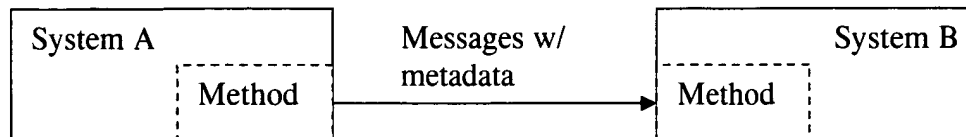
Before discussing specific aspects of the claimed subject matter, Applicant believes it would be useful to provide a general discussion of the prior art and some aspects of the present invention. Typical "Message Oriented Middleware" systems of the prior art offer a model of message translation among independent systems in which methods of defining transactions, implementing application logic, distributing applications, etc. remain unaddressed. As a result, one can only use such MOM systems if there is a strict one-to-one

relationship between the messages to be passed between any two participating systems, and no additional application logic is necessary. Otherwise, one must resort to methods outside the MOM model (traditional programming tools, etc.).

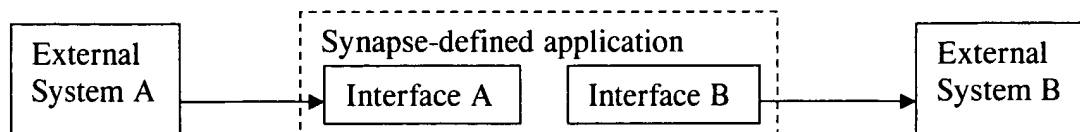
Preferred embodiments of the present invention do not have these limitations. Under MOM, in order for System B to receive a message from System A, the message is translated from format A to format B. According to the present invention, the message may be translated from format A to an internally universal format ("context") which may be referenced, modified and extended. "Context" is not just a message format -- it also defines transaction parameters (and, in fact, preferably contains the text of the original message still in format A along with the independent element values gleaned from that message's contents).

In rejecting Applicant's claims, the Office Action primarily refers to columns 211 and 212 of the lengthy Bowman-Amuah reference. That portion of the reference describes a stream-based communication system by which *two independently* operating systems communicate data *and metadata* (which describes the format/contents of the data). In other words, both of the

independently created and operating systems implement the method and may interpret messages sent from one to the other:



This is in contrast to the present invention in which a *single* self-contained, possibly distributed system may be configured to communicate with other systems. These other systems need not implement Applicant's inventive methods. In other words, the present invention presupposes that other systems exist which use stream-based communications systems implementing fixed format messages. Communication with such systems can occur without any requirement to change those systems, even if they have dissimilar message formats and semantics:



These concepts are variously reflected in each of the independent claims of the present application. For example, step (c) of independent claim 1 requires applying a

predetermined criteria to the request data so as to generate the transaction request. The transaction request, thus generated, is routed to an appropriate service system to be fulfilled. In other words, the transaction request is ascertained from the request data and is then routed based on its content to the appropriate system. This is distinctly different from merely translating among different message formats or protocols.

Similarly, independent claim 11 relates to a system in which a plurality of computer systems have stored configuration objects indicating expected transaction requests and corresponding service systems. The transaction requests are disassociated from incoming messages and are automatically routed to the appropriate service system for fulfillment. Again, this process of extracting the transaction request, examining it and appropriately routing it is in contrast to the prior art.

Independent claim 16 indicates that the first message is translated into "organizationally independent context data structure." As noted above, context is not just a "message format" - it also defines transaction parameters (and, in fact, preferably contains the text of the original message still in

Format A along with the independent element values gleaned from that message's contents). Nothing of this sort is taught or suggested in the Bowman-Amuah reference cited in the Office Action.

Various dependent claims in the present application serve to further limit and define the inventive subject matter set forth in the claims from which they depend. For at least the reasons stated above plus the additional limitations they present, each of these dependent claims is believed to be fully patentable over the prior art.

Inasmuch as all outstanding issues raised by the Examiner have been addressed, it is submitted that the present application, including claims 1-18 is in condition for allowance, and action to such effect is respectfully requested. The Examiner is invited to telephone the undersigned should any minor issues remain after consideration of the present amendment, to permit early resolution of same.

Appl. No. 09/940,179
Amdt. dated April 19, 2006
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Respectfully submitted,

A handwritten signature in black ink, reading "Craig N. Killen", written over a horizontal line.

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